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On November 16, 1990, the United States Environmental Protection Agency (EPA) published regulations which require certain industrial dischargers of storm water to apply for storm water permits under the National Pollutant Discharge Elimination System (NPDES) program. In Minnesota, the NPDES program is administered by the Minnesota Pollution Control Agency (MPCA). On November 2, 1992, MPCA issued a NPDES General Permit for storm water Discharges Associated with Industrial Activity, Permit Number MN G610000. Each industrial facility covered by the MPCA General Permit was required to prepare a Storm Water Pollution Prevention (SWPP) plan by November 2, 1993 and to implement the plan by November 2, 1994.

U. S. Steel Minnesota Ore Operations (Minntac) developed a SWPP plan for storm water discharges from the entire facility, i.e., the tailings basin, processing plants and mine pits, in December 1993 (see Appendix A) based on the requirements of General Permit MN G610000, which was to expire on November 2, 1997. At the time that the Minnesota Storm Water General Permit was issued, non-storm water discharges from the Minntac facility were regulated by two previously-issued water discharge permits: NPDES/SDS (State Disposal System) Permit Number MN0057207, issued on February 23, 1989, for the Minntac Tailings Basin Area, and NPDES/SDS Permit MN0052493, issued on December 7, 1989, for the Minntac Mine Area. These Permits provide Minntac the authorization to construct, install and operate wastewater disposal systems under the requirements specified by each.

Minntac's NPDES/SDS Permit MN0052493 was reissued on December 18, 1996. As per language in the reissued permit, Minntac was required to prepare a detailed and comprehensive Water Quality Pollution Prevention Plan (WQPPP) for the Mine Area, which encompasses a large portion of the processing plants, no later than March 31, 1997. The requirement for a WQPPP was included in the reissued Mine Area NPDES permit as a means of addressing site-specific storm water-related concerns. Through the WQPPP, the MPCA embodied all of the Storm Water General Permit requirements in the reissued permit for those portions of the facility from which storm water drained toward the Mine Pits, i.e., all of the Minntac property south of the Laurentian Divide. As described in the cover letter accompanying the permit, "This reissued permit supersedes the previous NPDES/SDS permit issued on December 7, 1989, and also supersedes general industrial storm water NPDES/SDS permit MN G610000 to the extent described in this permit."

A revised WQPPP was subsequently developed due to a number of minor changes and additions, and with MPCA's approval, became effective on March 31, 1998. The 1998 WQPPP incorporated the following items/documents: applicable Best Management Practices (BMPs) specified in the SWPP plan described above; management practices identified in the January 1996 U. S. Steel Minntac Outfall 950 Characterization Study Phase 1 Report, as supplemented by a March 29, 1996 letter from Minntac to the MPCA; and the original March 31, 1997 WQPPP. To ensure that storm water pollution prevention was applied across the facility, the WQPPP incorporated BMPs and inspection procedures developed by the 1993 SWPP plan for the Tailings Basin Area.

Minntac's NPDES/SDS Permit MN0052493 was again reissued on January 7, 2004, and contains language related to a Storm Water Pollution Prevention Plan (Chapter 6, Section 3), which under Subsection 3.2 states, "The Permittee shall comply with the Pollution Prevention Plan for the facility dated February 2003, and with revisions to this Plan as approved by the MPCA." The Pollution Prevention Plan described by the January 2004 reissued permit is comprised of the BMPs from the 1998 WQPPP containing additional minor changes as required by MPCA during draft permit development. These BMPs are shown electronically in Sections 2.0 and 3.0 of the WQPPP.

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The Minnesota General Storm Water Permit for Industrial Activity (Permit MN G610000) was reissued on October 1, 1997, with a scheduled expiration date of September 30, 2002. Although the Minntac Mine Area NPDES/SDS Permit MN0052493 incorporated and superseded Permit MN G610000, the Tailings Basin Area still required coverage under the general storm water permit.

Based on guidance received from the MPCA, Minntac submitted an application for coverage under Permit MN G610000 for the Tailings Basin Area on May 2, 2003. MPCA acknowledged receipt of the application in a letter dated May 6, 2003, and indicated that an identification number would be assigned to the facility once the General Storm Water Permit for Industrial Activity was reissued. However, to date, the permit has not been reissued.

Table 1, and Section 2.0 of the WQPPP, describes BMPs adopted by U. S. Steel for activities originally identified by the 1993 SWPP plan and in the Mine Area Permit (MN0052493) issued December 18, 1996, with regard to surface and groundwater quality at the facility. Table 2, and Section 3.0 of the WQPPP, identifies additional BMPs implemented by Minntac as a result of other environmental plans. These plans include the Spill Prevention Control and Countermeasure (SPCC) Plan and the Facility Response Plan (FRP). Tables 1 and 2 were developed to cross reference the various BMPs, referred to as WQPPP activities, between the 1997 WQPPP, the 1998 WQPPP and the studies completed at the former 950 monitoring station. Table 3 lists those personnel/positions at Minntac that are currently responsible for managing and implementing requirements of Minntac's SWPP Plan.

Appendix A contains the SWPP plan completed in December 1993, while Appendix B contains the various worksheets referred to by the 1993 SWPP plan, and Appendix C contains the original storm water site assessment completed as part of the SWPP plan development process. Stormwater maps for the facility are presented in Appendix D. The forms used for routine facility storm water inspections can be found in Appendix E.